

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

GILBERT JAMES : Civil Action No.
vs. : 3:11CV00221
ENCORE CAPITAL GROUP, INC., et al. : January 23, 2012

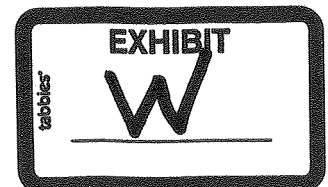
COMPLETE TRANSCRIPT OF THE MOTIONS HEARING
BEFORE THE HONORABLE ROBERT E. PAYNE
UNITED STATES DISTRICT JUDGE

APPEARANCES:

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Official Court Reporter
United States District Court



1 THE COURT: All right. Anything else?

2 MR. BENNETT: No, sir.

3 THE COURT: The objection is overruled. They are to
4 provide from the period April 1, 2008, to the present. Part
5 two, what's the filing date of this case, April 1, 2011?

6 MR. ST. GEORGE: April 7th, Your Honor.

7 THE COURT: All right, April 7, 2011, a copy of each
8 complaint filed in every lawsuit in which it's been sued for an
9 alleged violation of 15 U.S.C. Section 1981(s)(2), and if it
10 does that, then it doesn't have to answer the interrogatory.
11 The cost of copying those complaints and shipping them to the
12 plaintiff will be borne by the plaintiff. All right?

13 MR. BENNETT: That concludes the remaining issues.
14 Judge, with respect to P, you have already ruled on that. That
15 is interrogatories one and two we discussed with respect to the
16 Exhibit A resolutions.

17 THE COURT: Request number what?

18 MR. BENNETT: It's interrogatories one and two at the
19 bottom of Exhibit A, or end of it, second to last page.

20 THE COURT: All right. And how about --

21 MR. BENNETT: Q, we've agreed to withdraw as a basis
22 of our motion interrogatory nine which is the issue in Q.

23 THE COURT: So that's withdrawn.

24 MR. BENNETT: Yes, sir. All right, now, that brings
25 us to the privilege issue in number, motion -- do you all need